

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

CASE NO: 07-CR-1023 (LAK)

Plaintiff,

vs.

LAWRENCE DAVIS

Defendant.

DEFENDANT'S MOTION FOR PERMISSION TO TRAVEL

COMES NOW the Defendant, LAWRENCE DAVIS, by and through undersigned counsel, and moves for the entry of an Order by this Honorable Court granting the Defendant permission to travel, and as grounds therefore would state the following:

1. That the Defendant entered a plea in the above-styled cause on November 7, 2007, and is scheduled to be sentenced in this matter on February 6, 2008.
2. That the Defendant and his wife desire to travel to Huntington Beach, California on January 31, 2008 and return on February 4, 2008, as the birth of their second grandchild is anticipated during that time. A copy of the airline itinerary is attached hereto and made a part hereof.
3. That during said time the Defendant and his wife will be staying at the home of their children which address is 3346 Sparkler Drive, Huntington Beach, California 92649-1924, telephone: 714-840-0521, and the Defendant and his wife can also be reached by cell phone, 954-946-4643 and/or 954-303-5960.
4. That undersigned counsel has contacted Christopher Lavigne, Assistant United States Attorney and he has no objection to the granting of this Motion.

5. That undersigned counsel has attempted to contact Thomas E. Mixon, United States Probation Officer, regarding this Motion without success.

WHEREFORE Defendant respectfully prays this Honorable Court grant the relief sought herein

I HEREBY CERTIFY that a copy of the foregoing has been electronically filed with the Clerk using CM/ECF and furnished to all counsel and parties of record as listed by the Clerk this 16th day of January 2008.

LYONS AND SANDERS CHARTERED
Attorney for Defendant DAVIS
600 N. E. Third Avenue
Fort Lauderdale, Florida 33304

BY: /s/

Bruce M. Lyons

Florida Bar No.: 104975



Dee Avers

From: sunglasslarry@aol.com
Sent: Tuesday, January 15, 2008 1:45 PM
To: bmlsec@lyonssanders.com
Subject: Fwd: Travel request

Sent 5 days ago

Best Regards
 Larry

-----Original Message-----

From: sunglasslarry@aol.com
 To: brucelyons@aol.com
 Sent: Thu, 10 Jan 2008 12:13 pm
 Subject: Travel request

To Whom it my Concern

United States Probation Office

Carrier	Flight Number	Departing		Arriving		Booking Code
		City	Date & Time	City	Time	
American Airlines	1121	FT LAUDERDALE	THU 31JAN 3:40 PM	DALLAS FT WORTH	5:55 PM	V
		Carol Davis		Economy	Seat 26C	Food For Purchase
		Larry Davis		Economy	Seat 26B	Food For Purchase
American Airlines	751	DALLAS FT WORTH	THU 31JAN 6:40 PM	SANTA ANA	7:55 PM	V
		Carol Davis		Economy	Seat 21A	Food For Purchase
		Larry Davis		Economy	Seat 21B	Food For Purchase
American Airlines	1328	SANTA ANA	MON 04FEB 9:55 AM	DALLAS FT WORTH	2:45 PM	S
		Carol Davis		Economy	Seat 21E	Food For Purchase
		Larry Davis		Economy	Seat 21F	Food For Purchase
American Airlines	2034	DALLAS FT WORTH	MON 04FEB 4:50 PM	FT LAUDERDALE	8:25 PM	S
		Carol Davis		Economy	Seat 23A	Food For Purchase
		Larry Davis		Economy	Seat 23B	Food For Purchase

PASSENGER	TICKET NUMBER	FARE-USD	TAX	TICKET TOTAL
CAROL DAVIS	0012103751662	286.51	63.09	349.60
LARRY DAVIS	0012103751663	286.51	63.09	349.60
Payment Type: Visa XXXXXXXXXXXXX2273				Total: \$699.20

The purpose of the Visit is to see Grand Child and family-Expecting mother due for second child around the time of our visit.

1/15/2008

We will be staying at our home in Huntington Beach

Can be reached at 954 946 4643 cell 954 303 5960

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